

EXHIBIT A

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Anzemet	A	Brand	An anti-emetic used in chemotherapy and post surgery	Aventis	MCCA ¶67; 1st AMCC ¶250 and Appendix A, 2nd AMCC, ¶250; 3rd AMCC ¶266; 4th AMCC ¶263; 5th AMCC ¶263	No	Yes
Aranesp	A	Brand	Used to treat anemia caused by chronic kidney disease or chemotherapy	Amgen	AMCC ¶ 217; 2nd AMCC ¶217; 3rd AMCC ¶ 233; 4th AMCC ¶ 230; 5th AMCC ¶ 230	No	Yes
Epogen	A	Brand	Used to treat anemia caused by chronic kidney disease in patients on dialysis	Amgen	CAC ¶ 24, MCCA ¶¶ 56, 192-94; 2nd AMCC ¶217; 3rd AMCC ¶ 233; 4th AMCC ¶ 230; 5th AMCC ¶ 230	No	Yes
Ferlecit	A	Brand	Used by patients with renal disease for treatment of iron deficiency	Watson	AMCC ¶ 526; 2nd AMCC ¶ 526, Appendix A; 3rd AMCC ¶¶ 537, 542, Appendix A; 4th AMCC ¶ 487, Appendix A, 5th AMCC ¶ 488	No	Yes
InFed (iron dextran)	A	Brand	Used by patients with renal disease for treatment of iron deficiency	Watson	MCCAC ¶¶ 130, 327; AMCC ¶¶ 130, 526, 534; 2nd AMCC ¶¶ 130, 526, 534, Appendixes A and B; 3rd AMCC ¶¶ 147, 537, 545, Appendix B; 4th AMCC ¶¶ 40, 144, 487, 595 Appendix A, 5th AMCC ¶ 488	No	Yes
Neulasta	A	Brand	Used to reduce the chance of infection in people who have certain types of cancer and are receiving chemotherapy medications that may decrease the number of neutrophils (a type of blood cell needed to fight infection).used to reduce the risk of infection (initially marked by fever) in chemotherapy patients	Amgen	AMCC ¶ 217; 2nd AMCC ¶217; 3rd AMCC ¶ 233; 4th AMCC ¶ 230; 5th AMCC ¶ 230	No	Yes
Neupogen	A	Brand	Used to decrease the chance of infection in people who have certain types of cancer and are receiving chemotherapy medications that may decrease the number of neutrophils (a type of blood cell needed to fight infection), in people who are undergoing bone marrow transplants, and in people who have severe chronic neutropenia (condition in which there are a low number of neutrophils in the blood)	Amgen	CAC ¶ 24, MCCA ¶¶ 56, 192-94; 2nd AMCC ¶217; 3rd AMCC ¶ 233; 4th AMCC ¶ 230; 5th AMCC ¶ 230	No	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Group B is comprised primarily of generic and multi-source drugs. Many of the products are hospital products administered in the hospital inpatient (Medicare Part A) and hospital outpatient (Medicare Part B based on AWP) setting. Group B also includes certain biologics. Since biologics are produced from human material, they are not subject to the provisions of the Hatch-Waxman Act allowing for generic drug approval of an abbreviated new drug application. Nonetheless, the biologics identified below all have multiple competitors and the competing biologics are reimbursed using the same J code and are akin, for reimbursement purposes, to innovator multiple source drugs.							
AccuNeb	B	Brand	Indicated for the relief of bronchospasm	Dey	AMCC ¶ 83, 2nd AMCC ¶ 83, 3rd AMCC ¶ 106, 4th AMCC ¶ 107; Revised 5th AMCC ¶ 107	No	Yes
Acetylcysteine	B	Generic	Primarily used in the hospital setting to thin mucus in lungs	Abbott	MCCAC ¶¶ 54, 190; AMCC ¶¶ 40, 201, 208; 2nd AMCC ¶¶ 40, 201, 208, Appendix A, Amended List of Purchases Made by Plaintiffs; 3rd AMCC ¶¶ 63, 217, 224, Appendix A, Amended List of Purchases Made by Plaintiffs; 4th AMCC ¶¶ 71, 214, 221	No	Yes
				Dey	MCCAC ¶¶ 90, 251, AMCC ¶¶ 81, 349, 359, 360, Appendix A; 2nd AMCC ¶¶ 81, 349, 359, 360, Appendix A; 3rd AMCC ¶¶ 104, 365, 375, 376, Appendix A. 4th AMCC, ¶¶ 105, 337, 347, 348, Appendix A; Revised 5th AMCC ¶ 105, 337, 347, 348	No	Yes
Acyclovir Sodium	B	Generic	Primarily used in the hospital setting as an antiviral	Abbott	MCCAC ¶¶ 54, 190; AMCC ¶¶ 40, 201; 2nd AMCC ¶¶ 40, 201, 208, Appendix A, Appendix B; 3rd AMCC ¶¶ 63, 217, 224, Appendix A, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 71, 214, 221	No	Yes
				Fujisawa	MCCAC ¶¶ 93; AMCC ¶¶ 86, 364, 371, Appendix A; 2nd AMCC ¶¶ 86, 364, 371, Appendix A; 3rd AMCC ¶¶ 109, 380, 387, Appendix A; 4th AMCC ¶¶ 110, 381, 388, Appendix A; 5th AMCC ¶¶ 110, 353, 360-63	No	Yes
				Sicor	MCCAC ¶ 323; AMCC ¶¶ 492, 501; 2d AMCC ¶¶ 492, 501; 3d AMCC ¶¶ 503, 512, Appendix A; 4th AMCC ¶¶ 472, 481, Appendix A; 5th AMCC ¶¶ 473, 482	No	Yes
Adenosine	B	Generic	Primarily used in the hospital setting to treat arrhythmia	Abbott	4th AMCC ¶ 16	Yes	Yes
				Fujisawa	4th AMCC, Appendix A; 5th AMCC	Yes	Yes
Adriamycin PFS/RFS	B	Multi-Source	Oncologic	Pharmacia	1st AC ¶¶ 181, 183, 184, 185, 186; 2nd AMCC ¶¶ 115, 458, 463, 464, 465, 466, 471, 472, Ex. A, Ex. B; 3rd AMCC ¶¶ 132, 469, 474, 475, 476, 477, 481, 482, 483, Ex. A, Ex. B; 4th AMCC ¶¶ 133, 438, 443, 444, 445, 451, 452, 454, App. A, App. B; 5th AMCC ¶¶ 133, 439, 444, 445, 446, 447, 452, 453, 455	No	Yes
Adrucil [see Fluorouracil]	B	Multi-Source	Oncologic	Pharmacia	CAC ¶ 41; 2nd AMCC ¶¶ 115, 458, 466, 472, Ex. A, Ex. B; 3rd AMCC ¶¶ 40, 132, 469, 477, 483, Ex. A, Ex. B; 4th AMCC ¶¶ 133, 438, 446, 452, App. A, App. B; 5th AMCC ¶¶ 133, 439, 447, 452	No	Yes
Aggrastat	B	Multi-source	Primarily used in inpatient surgery in connection with angioplasty	Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A; 3rd AMCC ¶ 288, App A; 4th AMCC ¶ 285; 4th AMCC Revised App A; 5th AMCC ¶ 285	No	Yes
Albuterol sulfate	B	Generic	Respiratory inhalation drug that is primarily used for relief of bronchospasm in patients with reversible obstructive airway disease and acute attacks of bronchospasm	Dey	MCCAC ¶¶ 90, 246-249; 251-253; AMCC ¶¶ 81, 349, 351, 352, 353, 356, 357, 358, 359, 360, Appendix A; 2nd AMCC, ¶¶ 81, 349, 351, 352, 353, 356, 357, 358, 359, 360, Appendix A; 3rd AMCC, ¶¶ 104, 365, 367, 368, 369, 372, 373, 374, 375, 376, Appendix A; 4th AMCC ¶¶ 105, 337, 339, 340, 341, 344, 345, 346, 347, 348, Appendix A; Revised 5th AMCC ¶ 105, 337, 339, 340, 341, 344, 345, 346, 347, 348	No	Yes
Alcohol injection	B	Generic	Primarily used in the hospital setting to treat chronic spinal and neck pain	Abbott	3rd AMCC ¶ 230, 4th AMCC ¶ 227	No	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
A-methapred	B	Generic (proprietary name)	Primarily used in the hospital setting as a steroid used to treat inflammation	Abbott	CAC ¶ 19; AMCC ¶ 201; 2nd AMCC ¶¶ 201, Appendix A, Amended List of Purchases Made by Plaintiffs; 3rd AMCC ¶¶ 217, Appendix A, Amended List of Purchases Made by Plaintiffs; 4th AMCC ¶ 214	No	Yes
Amikacin sulfate	B	Generic	Primarily used in the hospital setting as an antibiotic	Abbott	MCCAC ¶¶ 54, 188, 190; AMCC @ TOC, ¶¶ 40, 201, 208; 2nd AMCC @ TOC, ¶¶ 40, 201, 208, 212, Appendix A, Appendix B; 3rd AMCC @ TOC, ¶¶ 63, 217, 224, 228, Appendix A, Amended List of Purchases Made By Plaintiffs; 4th AMCC @ TOC, ¶¶ 71, 214, 221, 225	No	Yes
				Sicor	MCCAC ¶ 323; AMCC ¶¶ 124, 492, 501; 2d AMCC ¶¶ 124, 492, 501; 3d AMCC ¶¶ 141, 503, 512, Appendix A; 4th AMCC ¶¶ 142, 472, 481, Appendix A; 5th AMCC ¶¶ 142, 473, 482	No	Yes
Aminocaproic acid	B	Generic	Primarily used in the hospital setting to stop bleeding	Abbott	3rd AMCC ¶ 230, 4th AMCC ¶ 227	No	Yes
Aminosyn / Aminosyn II / Amino acid	B	Multi-Source	Primarily used in the hospital setting to treat nitrogen loss or negative nitrogen balance	Abbott	AMCC ¶ 201; 2nd AMCC ¶ 201, Appendix A, Appendix B; 3rd AMCC ¶¶ 217, 230, Appendix A, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 214, 227	No	Yes
Amphocin / Amphotericin B	B	Generic	Primarily used in the hospital setting as an antifungal	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
				Pharmacia	2nd AMCC ¶¶ 115, 458, 466, 472, Ex. A, Ex. B; 3rd AMCC ¶¶ 132, 469, 477, 483, Ex. A, Ex. B; 4th AMCC ¶¶ 133, 438, 446, 452, App. A, App. B; 5th AMCC ¶¶ 133, 439, 447, 453	No	Yes
				Sicor	AMCC ¶ 492; 2d AMCC ¶ 492; 3d AMCC ¶ 503, Appendix A; 4th AMCC ¶ 472, Appendix A; 5th AMCC ¶ 473	No	Yes
Aristocort	B	Branded Multi-Source	Oral cortiosteroid used primarily in hospital setting to treat inflammation	Fujisawa	AMCC ¶ 364, Appendix A; 2nd AMCC ¶371, Appendix A; 3rd AMCC ¶380, Appendix A; 4th AMCC ¶381, Appendix A; 5th AMCC ¶353	No	Yes
Aristospan	B	Branded Multi-Source	Injectable cortiosteroid used primarily in hospital setting to treat inflammation	Fujisawa	AMCC ¶ 364, Appendix A; 2nd AMCC ¶371, Appendix A; 3rd AMCC ¶380, Appendix A; 4th AMCC ¶381, Appendix A; 5th AMCC ¶353	No	Yes
Aromasin	B	Brand	Oncolitic	Pharmacia	2nd AMCC ¶ 115; 3rd AMCC ¶ 132; 4th AMCC ¶ 133; 5th AMCC ¶ 133	No	Yes
Ativan	B	Multi-source	Primarily used in the hospital setting to treat anxiety disorders	Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A, App B; 3rd AMCC ¶ 288, App A, App B; 4th AMCC ¶ 285; 4th AMCC Revised App A, App B; 5th AMCC ¶ 285	No	Yes
Azmacort	B	Brand	A corticosteroid used primarily to treat symptoms of asthma (wheezing, shortness of breath) and other lung diseases	Aventis	1st AMCC ¶250, and Appendix A; 2nd AMCC ¶250; 3rd AMCC ¶266; 4th AMCC ¶263; 5th AMCC ¶263	No	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Bebulin	B	Multi-Source Biologic	Anti-hemophilic factor used to treat hemophilia	Baxter	MCCAC ¶ 71; AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A; 3rd AMCC ¶¶ 83, 288, App A; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A; 5th AMCC ¶¶ 91, 285	No	Yes
Bioclote	B	Multi-Source Biologic	Anti-hemophilic factor (recombinant), used to treat hemophilia	Aventis	MCCA ¶67; 1st AMCC ¶55; 2nd AMCC ¶55; 3rd AMCC ¶78; 4th AMCC ¶86; 5th AMCC ¶86	No	Yes
Bleomycin sulfate	B	Generic	Primarily used in the hospital setting as an antibiotic used in treatment of Hodgkin's lymphoma	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
				Pharmacia	1st Amd Compl. ¶ 183, 187; 2nd AMCC ¶¶ 115, 458, 463, 466, 470, 471, Ex. A, Ex. B; 3rd AMCC ¶¶ 52, 132, 469, 474, 477, 481, 482, Ex. A, Ex. B; 4th AMCC ¶¶ 60, 133, 438, 443, 446, App. A, App. B; 5th AMCC ¶¶ 60, 133, 439, 444, 447	No	Yes
Brevibloc	B	Multi-source	Primarily used in the hospital setting to slow heart rate during surgery	Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A; 3rd AMCC ¶ 288, App A; 4th AMCC ¶ 285; 4th AMCC Revised App A; 5th AMCC ¶ 285	No	Yes
Buminate	B	Multi-Source Biologic	Blood product used in the hospital setting for cardiopulmonary surgery	Baxter	MCCAC ¶ 71; AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A; 3rd AMCC ¶¶ 83, 288, App A; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A; 5th AMCC ¶¶ 91, 285	No	Yes
Bupivacaine	B	Generic	Primarily used in the hospital setting as a local anaesthetic	Abbott	3rd AMCC ¶¶ 15, 230; 4th AMCC ¶¶ 15, 227	Yes	Yes
Calcijex	B	Brand through 10/01; thereafter multi-source	Primarily used in the hospital setting as a man-made form of vitamin D	Abbott	CAC ¶ 19; MCCAC ¶ 190; AMCC ¶ 201; 2nd AMCC ¶¶ 201, 208, Appendix A, Appendix B; 3rd AMCC ¶¶ 217, 224, Appendix A, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 214, 221	No	Yes
Calcimar	B	Brand	A human hormone used primarily to treat Paget's disease and osteoporosis in postmenopausal women	Aventis	1st AMCC ¶250, and Appendix A; 2nd AMCC ¶250; 3rd AMCC ¶266; 4th AMCC ¶263; 5th AMCC ¶263	No	Yes
Camptosar / Irinotecan hydrochloride	B	Brand	Oncolitic	Pharmacia	CAC ¶ 41; 2nd AMCC ¶¶ 115, 467, 468; 3rd AMCC ¶¶ 132, 478, 479; 4th AMCC ¶ 133, 447, 448; 5th AMCC ¶ 133, 448, 449	No	Yes
Carbocaine / Mepivacaine	B	Generic	Primarily used in the hospital setting as local anaesthetic	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Cefizox	B	Brand	Injectable antibiotic used primarily in hospital setting	Fujisawa	AMCC ¶ 364, Appendix A; 2nd AMCC ¶371, Appendix A; 3rd AMCC ¶380, Appendix A; 4th AMCC ¶381, Appendix A; 5th AMCC ¶353	No	Yes
Chromium tr meta / Chromic chloride	B	Generic	Primarily used in the hospital setting as an additive to IV solutions for total parenteral nutrition	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Cimetidine hydrochloride	B	Generic	Primarily used in the hospital setting to inhibit production of acid in stomach	Abbott	MCCAC ¶¶ 54, 190; AMCC ¶¶ 40, 201, 208; 2nd AMCC ¶¶ 40, 201, 208, Appendix A, Appendix B; 3rd AMCC ¶¶ 63, 217, 224, Appendix A, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 71, 214, 221	Yes	Yes
Cipro / Ciprofloxacin hydrochloride	B	Generic	Primarily used in the hospital setting as an antibiotic	Abbott	3rd AMCC ¶ 16; 4th AMCC ¶ 17	Yes	Yes
		Multisource as of June 9, 2004		Bayer	Modified 1st Am. Compl. ¶ 286 (Dec. 8, 2003); 2nd AMCC ¶ 286; 3rd AMCC ¶ 302, Appendix; 4th AMCC ¶¶ 17, 299, Appendix A; Appendix to 4th AMCC	No	Yes
Cisplatin	B	Multi-source	Primarily used in the hospital setting as a chemotherapy drug	Baxter	MCCAC ¶ 71; AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A; 3rd AMCC ¶¶ 83, 288, App A; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A; 5th AMCC ¶¶ 91, 285	No	Yes
				Sicor	4th AMCC ¶¶ 15, 17, 60; 5th AMCC ¶¶ 15, 17, 60	Yes	Yes
Claforan	B	Multi-source	Primarily used in the inpatient hospital setting to prevent staph infections	Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A; 3rd AMCC ¶ 288, App A; 4th AMCC ¶ 285; 4th AMCC Revised App A; 5th AMCC ¶ 285	No	Yes
Cleocin T / Clindamycin phosphate	B	Generic	Primarily used in the hospital setting as an antibiotic	Abbott	MCCAC ¶¶ 54, 190; AMCC ¶¶ 40, 201; 2nd AMCC ¶¶ 40, 201, 208, Appendix A, Amended List of Purchases Made By Plaintiffs; 3rd AMCC ¶¶ 63, 224, Appendix A, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 71, 214, 221	No	Yes
		Branded Multi-Source	Antibiotic	Pharmacia	2nd AMCC ¶¶ 115, 458, 466, Ex. A, Ex. B; 3rd AMCC; ¶¶ 20, 132, 469, 477, Ex. A, Ex. B, 4th ¶¶ 133, 438, 446, 451, App. A, App. B 5th AMCC ¶¶ 133, 439, 447	No	
Cromolyn sodium	B	Generic	Respiratory inhalation drug used to treat patients with bronchial asthma	Dey	MCCAC ¶¶ 90, 251. AMCC ¶¶ 81, 349, 355, 359, 360, 362, Appendix A; 2nd AMCC ¶¶ 81, 349, 355, 359, 360, 362, Appendix A, 3rd AMCC, ¶¶ 104, 365, 371, 375, 376, 378, Appendix A; 4th AMCC ¶¶ 105, 337, 343, 347, 348, 350, Appendix A; Revised 5th AMCC ¶¶ 105, 337, 343, 347, 348, 350	No	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Cytosar-U / Cytarabine	B	Multi-source	Oncolitic	Pharmacia	2nd AMCC ¶¶ 115, 458, 466, Ex. A, Ex. B; 3rd AMCC ¶¶ 132, 469, 477, Ex. A, Ex. B; 4th AMCC ¶¶ 133, 438, 446, App. A, App. B; 5th AMCC ¶¶ 133, 439, 447	No	Yes
Depo provera / Medroxyprogesterone acetate	B	Brand	Contraception	Pharmacia	4th AMCC ¶ 23, Revised App. A; 5th AMCC ¶ 23	Yes	Yes
Depo-testosterone / Testosterone cypionate	B	Multi-Source	Hormone	Pharmacia	2nd AMCC ¶¶ 115, 458, 466, Ex. A, Ex. B; 3rd AMCC ¶ 132, 469, 477, Ex. A, Ex. B; 4th AMCC ¶¶ 133, 438, 446, App. A, App. B; 5th AMCC ¶¶ 133, 439, 447	No	Yes
Dexamethasone acetate	B	Generic	Primarily used in the hospital setting as an anti-inflammatory to treat allergic reactions	Abbott	3rd AMCC ¶ 19; 4th AMCC ¶ 21	Yes	Not a Bayer Drug
				Bayer (but not a Bayer drug)	4th AMCC ¶ 21	Yes	Yes
				Watson	MCCAC ¶¶ 130, 327; AMCC ¶¶ 130, 526, 534; 2nd AMCC ¶¶ 130, 526, 534, Appendixes A and B; 3rd AMCC ¶¶ 147, 537, 545, Appendix B; 4th AMCC ¶¶ 17, 21, 144, 487, 495, Appendix A, 5th AMCC ¶ 488	No	Yes
Dexamethasone sodium / Dexamethasone sodium phosphate	B	Generic	Anti-inflammatory, treats allergic reactions, autoimmune disease and certain cancers	Abbott	3rd AMCC ¶ 39; 4th AMCC ¶ 47	No	Yes
				Fujisawa	MCCAC ¶93; AMCC ¶¶86, 364, 371, Appendix A; 2nd AMCC ¶ 186, 364, 371, Appendix A; 3rd AMCC ¶ 1109, 380, 387, Appendix A; 4th AMCC ¶ 1110, 381, 388, Appendix A; 5th AMCC ¶ 1110, 353, 360-63	No	Yes
				Sicor	4th AMCC ¶¶ 15, 17, 18, 21; 5th AMCC ¶¶ 15, 17, 18, 21	Yes	Yes
				Watson	MCCAC ¶ 327; AMCC ¶¶ 526, 534; 2nd AMCC ¶¶ 526, 534, Appendixes A and B; 3rd AMCC ¶¶ 537, 545, Appendixes A and B; 4th AMCC ¶¶ 17, 21, 52, 487, 495, Appendix A, 5th AMCC ¶ 488, 5th AMCC ¶ 488	No	Yes
Dextrose / Dextrose sodium chloride / Ringers lactated with dextrose	B	Generic	Primarily used in the hospital setting as a diluent	Abbott	MCCAC ¶¶ 26, 54, 190; AMCC ¶¶ 29, 40, 201, 208; 2nd AMCC ¶¶ 29, 40, 201, 208, Appendix A, Appendix B; 3rd AMCC ¶¶ 15, 16, 21, 63, 217, 224, Appendix A, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 15, 17, 25, 71, 214, 221	No, except for ringers lactated with dextrose inj (but shares J Code with other Dextrose products listed)	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
		Multi-source	Primarily used in the hospital setting as a diluent	Baxter	MCCAC ¶¶ 71, 217; AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A; 3rd AMCC ¶¶ 83, 288, App A; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A; 5th AMCC ¶¶ 91, 285	No, except for ringers lactated with dextrose inj (but shares J Code with other Dextrose products listed)	Yes
Diazepam	B	Generic	Primarily used in the hospital setting to treat anxiety and nervousness	Abbott	MCCAC ¶¶ 54, 190; AMCC ¶¶ 40, 201 ; 2nd AMCC ¶¶ 40, 201, 208, Appendix A, Appendix B; 3rd AMCC ¶¶ 63, 217, 224, Amended List of Purchases Made By Plaintiffs, Purchases Made By Plaintiffs; 4th AMCC ¶¶ 71, 214, 221	No	Yes
				Watson	MCCAC ¶¶ 130, 327; AMCC ¶¶ 130, 526, 534; 2nd AMCC ¶¶ 130, 526, 534, Appendixes A and B; 3rd AMCC ¶¶ 147, 537, 545, Appendixes A and B; 4th AMCC ¶¶ 144, 487, 495, Appendix A	No	Yes
Dacarbazine (see DTIC - Dome)	B	Multi-Source	Antineoplastic cancer medication	Bayer	Modified 1st Am. Compl. ¶ 286 (Dec. 8, 2003); 2nd AMCC ¶ 286; 3rd AMCC ¶ 302, Appendix; 4th AMCC ¶ 299, Appendix A; Appendix to 4th AMCC	No	Yes
Diltiazem hydrochloride	B	Generic	Primarily used in the hospital setting to treat hypertension, angina and some types of arrhythmia	Abbott	3rd AMCC ¶¶ 15, 20; 4th AMCC ¶ 15	Yes	Yes
				Sicor	4th AMCC ¶ 15	Yes	Yes
Dopamine hydrochloride	B	Generic	Primarily used in the hospital setting to improve the heart's contractions	Abbott	3rd AMCC ¶¶ 19, 230; 4th AMCC ¶¶ 21, 227; 5th AMCC ¶ 15	Yes	Yes
Doxorubicin / Doxorubicin hydrochloride [see Adriamycin]	B	Generic	Primarily used in the hospital setting as an oncologic	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
				Baxter	AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A; 3rd AMCC ¶¶ 83, 288, App A; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A; 5th AMCC ¶¶ 91, 285	No	Yes
				Fujisawa	MCCAC ¶¶ 86, 364, 371, Appendix A; 2nd AMCC ¶¶ 86, 364, 371, Appendix A; 3rd AMCC ¶¶ 109, 380, 387, Appendix A; 4th AMCC ¶¶ 110, 381, 388, Appendix A; 5th AMCC ¶¶ 110, 353, 360-63	No	Yes
				Pharmacia	See Adriamycin	No	Yes
				Sicor	AMCC ¶ 492; 2d AMCC ¶¶ 492, 499, 503; 3d AMCC ¶¶ 503, 510, 514, Appendix A; 4th AMCC ¶¶ 472, 479, 483, Appendix A; 5th AMCC ¶¶ 473, 480, 484	No	Yes
DTIC Dome [see Dacarbazine]	B	Multi-Source	Antineoplastic cancer medication	Bayer	Modified 1st Am. Compl. ¶ 286 (Dec. 8, 2003); 2nd AMCC ¶ 286; 3rd AMCC ¶ 302, Appendix; 4th AMCC ¶ 299, Appendix A; Appendix to 4th AMCC	No	Yes

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Eligard	B	Brand (but shares Jcode with therapeutic equivalent)	Used primarily to treat the symptoms of advanced prostate cancer	Aventis	4th AMCC ¶19; 5th AMCC ¶19	Yes	Yes
Ellence / Epirubicin HCL	B	Brand	Oncolitic	Pfizer	AMCC ¶ 41; 2nd AMCC ¶ 115; 3rd AMCC ¶¶ 19, 132; 4th AMCC ¶ 133; 5th AMCC ¶ 133	No	Yes
Enalaprilat	B	Generic	ACE inhibitor	Sicor	4th AMCC ¶ 17; 5th AMCC ¶ 17	Yes	Yes
Enbrel	B	Brand	Largely self-administered; used to treat moderate to severe rheumatoid arthritis, adult chronic moderate to severe plaque psoriasis, psoriatic arthritis, ankylosing spondylitis and moderate to severe juvenile idiopathic arthritis	Amgen	AMCC ¶ 217; 2nd AMCC ¶217; 3rd AMCC ¶ 233; 4th AMCC ¶ 230; 5th AMCC ¶ 230	No	Yes
Epinephrine	B	Generic	Primarily used in the hospital setting to treat severe allergic reactions	Abbott	3rd AMCC ¶¶ 15, 230; 4th AMCC ¶¶ 15, 227	Yes	Yes
				Sicor	4th AMCC ¶ 15; 5th AMCC ¶ 15	Yes	Yes
Erythromycin / Erythromycin base	B	Generic	Primarily used in the hospital setting as an antibiotic	Abbott	AMCC ¶ 201; 2nd AMCC ¶ 201, Appendix A, Appendix B; 3rd AMCC ¶ 217, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶ 214	No	Yes
Estradiol	B	Generic	Hormone used for treatment of menopause and postmenopausal osteoporosis	Watson	AMCC ¶ 526; 2nd AMCC ¶ 526, Appendixes A and B; 3rd AMCC ¶ 537, Appendixes A and B; 4th AMCC ¶ 487, 5th AMCC ¶ 488	No	Yes
Etoposide [see Toposar]	B	Multi-Source		Pharmacia	See Toposar	No	Yes
		Generic		Sicor	MCCAC ¶ 319; AMCC ¶¶ 492, 496; 2d AMCC ¶¶ 492, 494, 496, 502, 503; 3d AMCC ¶¶ 503, 505, 507, 513, 514, Appendix A; 4th AMCC ¶¶ 17, 60, 472, 474, 476, 482, 483, Appendix A	No	Yes
Famotidine	B	Generic	Primarily used in the hospital setting as an antihistamine that blocks release of stomach acid	Abbott	3rd AMCC ¶¶ 15, 16; 4th AMCC ¶¶ 15, 17	Yes	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Fentanyl citrate	B	Generic	Primarily used in the hospital setting as a pain reliever	Abbott	AMCC ¶ 201; 2nd AMCC ¶ 201, Appendix A, Appendix B; 3rd AMCC ¶¶ 19, 20, 217, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 15, 17, 21, 214	No	Yes
Fluorouracil [see Adrucil]	B	Multi-source	Oncologic	Pharmacia	CAC ¶ 41; 2nd AMCC ¶¶ 115, 458, 466, 472, Ex. A, Ex. B; 3rd AMCC ¶¶ 40, 132, 469, 477, 483, Ex. A, Ex. B	No	Yes
				Fujisawa	MCCAC ¶93; AMCC ¶¶86, 364, 371, Appendix A; 2nd AMCC ¶¶86, 364, 371, Appendix A; 3rd AMCC ¶¶109, 380, 387, Appendix A; 4th AMCC ¶¶110, 381, 388, Appendix A; 5th AMCC ¶¶110, 353, 360-63	No	Yes
Fluphenazine HCL	B	Generic	Psychotherapeutic agent used to manage psychotic disorders	Watson	AMCC ¶¶ 526, 536; 2nd AMCC ¶¶ 526, 536, Appendixes A and B; 3rd AMCC ¶¶ 537, 547, Appendixes A and B; 4th AMCC ¶¶ 487, 495, Appendix A	No	Yes
Furosemide	B	Generic	Primarily used in the hospital setting as a diuretic	Abbott	MCCAC ¶¶ 26, 54, 190; AMCC ¶¶ 29, 40, 201, 208; 2nd AMCC ¶¶ 29, 40, 201, 208, Appendix A, Appendix B ; 3rd AMCC ¶¶ 15, 20, 21, 32, 42, 63, 217, 224, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 15, 25, 40, 50, 71, 214, 221	No	Yes
Gamimune N	B	Multi-Source Biologic	Immune globulin used to treat primary immune deficiency	Bayer	MCCAC ¶ 74; AMCC ¶ 63; Modified 1st Am. Compl. ¶¶ 63, 286 (Dec. 8, 2003); 2nd AMCC ¶¶ 63, 286; 3rd AMCC ¶¶ 86, 302, Appendix; 4th AMCC ¶¶ 94, 299, Appendix A; Appendix to 4th AMCC	No	Yes
Gammagard / Gammagard S/D / Gammar / Gammar P.I.V.*	B	Multi-Source Biologic	A sterilized human plasma solution, used primarily to treat immune deficiency conditions	Baxter	CAC ¶ 28; MCCAC ¶ 71; AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A; 3rd AMCC ¶¶ 83, 288, App A; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A; 5th AMCC ¶¶ 91, 285	No	Yes
				Aventis (Gammar PIV)	CAC ¶ 24; MCCAC ¶ 20; AMCC ¶¶ 17, 80; Corrected AMCC dkt 928 ¶¶ 19, 88, App A; 3rd AMCC ¶¶ 29, 97, App A; 4th AMCC ¶¶ 31, 97; 4th AMCC dkt 2244 Revised App A; 5th AMCC dkt 5902 at 31, 97 Aventis (Gammar PIV) - initial cite MCCAC, ¶67, and App. A	No	Yes
Gentamicin sulfate	B	Generic	Primarily used in the hospital setting to treat infections	Abbott	MCCAC ¶¶ 26, 54, 190; AMCC ¶¶ 29, 40, 201, 208; 2nd AMCC ¶¶ 29, 40, 201, 208, Appendix A, Appendix B; 3rd AMCC ¶¶ 21, 63, 217, 224, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 25, 71, 214, 221	No	Yes
				Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A; 3rd AMCC ¶ 288, App A; 4th AMCC ¶ 285; 4th AMCC Revised App A; 5th AMCC ¶ 285	No	Yes
				Fujisawa	MCCAC ¶93; AMCC ¶¶86, 364, 371, Appendix A; 2nd AMCC ¶¶86, 364, 371, Appendix A; 3rd AMCC ¶¶109, 380, 387, Appendix A; 4th AMCC ¶¶110, 381, 388, Appendix A; 5th AMCC ¶¶110, 353, 360-63	No	
				Watson	MCCAC ¶¶ 130, 327; AMCC ¶¶ 130, 526, 534; 2nd AMCC ¶¶ 130, 526, Appendixes A and B; 3rd AMCC ¶¶ 147, 537, Appendixes A and B; 4th AMCC ¶¶ 144, 487, 495, Appendix A	No	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Gentran / Gentran NACL	B	Multi-source	Primarily used in the hospital/surgical setting as an anti-coagulant	Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A; 3rd AMCC ¶ 288, App A; 4th AMCC ¶ 285; 4th AMCC Revised App A; 5th AMCC ¶ 285	No	Yes
Glycopyrrolate	B	Generic	Primarily used in the hospital setting to treat peptic ulcer disease	Abbott	3rd AMCC ¶ 15; 4th AMCC ¶ 15; 5th AMCC ¶ 15	Yes	Yes
				Sicor	4th AMCC ¶ 15	Yes	Yes
Helixate / Helixate FS	B	Multi-Source Biologic	Anti-hemophilic factor (recombinant), used to treat hemophilia	Aventis	MCCA ¶ 67; 1st AMCC ¶ 55; 2nd AMCC ¶ 55; 3rd AMCC ¶ 78; 4th AMCC ¶ 86; 5th AMCC ¶ 86	No	Yes
Heparin / Heparin lock flush / Heparin sodium	B	Generic	Primarily used in the hospital setting as an anticoagulant	Abbott	MCCAC ¶¶ 26, 54, 190; AMCC ¶¶ 29, 40, 201, 208; 2nd AMCC ¶¶ 29, 40, 201, 208, Appendix A, Appendix B; 3rd AMCC ¶¶ 15, 19, 20, 21, 63, 217, 224, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 15, 21, 25, 71, 214, 221	No	Yes
				Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A; 3rd AMCC ¶ 288, App A; 4th AMCC ¶ 285; 4th AMCC Revised App A; 5th AMCC ¶ 285	No	Yes
Humate-P	B	Multi-Source Biologic	Anti-hemophilic factor/von Willebrand factor complex, used to treat hemophilia and von Willebrand disease	Aventis	MCCA ¶ 67; 1st AMCC ¶ 55; 2nd AMCC ¶ 55; 3rd AMCC ¶ 78; 4th AMCC ¶ 86; 5th AMCC ¶ 86	No	Yes
Hydromorphone	B	Generic	Primarily used in the hospital setting as a pain reliever	Abbott	3rd AMCC ¶¶ 15, 20; 4th AMCC ¶¶ 15, 17	Yes	Yes
Idamycin / Idarubicin hydrochloride	B	Brand	Oncologic	Pharmacia	1st Amd Compl. ¶ 183; 2nd AMCC ¶¶ 115, 463; 3rd AMCC ¶¶ 132, 474; 4th AMCC ¶ 133, 443; 5th AMCC ¶ 133, 144	No	
Imipramine HCL	B	Generic	Psychotherapeutic agent used in treatment of depression	Watson	AMCC ¶¶ 526, 536; 2nd AMCC ¶¶ 526, 536, Appendix A; 3rd AMCC ¶¶ 537, 547, Appendixes A and B; 4th AMCC ¶¶ 487, 495, 5th AMCC ¶ 488	No	Yes
Intal	B	Brand	Used primarily to treat symptoms of asthma (wheezing, shortness of breath) and exercise induced bronchospasm	Aventis	1st AMCC ¶ 250, and Appendix A; 2nd AMCC ¶ 250; 3rd AMCC ¶ 266; 4th AMCC ¶ 263; 5th AMCC ¶ 263	No	Yes
Ipratropium bromide	B	Generic	Respiratory inhalation drug used for the maintenance treatment of bronchospasms associated with Chronic Obstructive Pulmonary Disease	Day	MCCAC ¶¶ 90, 253, AMCC ¶¶ 81, 83, 349, 352, 353, 354, 362, Appendix A; 2nd AMCC, ¶¶ 81, 83, 349, 352, 353, 354, 362, Appendix A; 3rd AMCC, ¶¶ 104, 106, 365, 368, 369, 370, 378, Appendix A, 4th AMCC ¶¶ 105, 107, 337, 340, 341, 342, 350, Appendix A; Revised 5th AMCC, ¶ 105, 107, 337, 340, 341, 342, 350	No	Yes
Iveegam	B	Multi-Source Biologic	Plasma replacement therapy for immune deficiencies	Baxter	MCCAC ¶ 71; AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A; 3rd AMCC ¶¶ 83, 288, App A; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A; 5th AMCC ¶¶ 91, 285	No	Yes
Ketorolac / Ketorolac tromethamine	B	Generic	Primarily used in the hospital setting as an anti-inflammatory to treat pain after surgery	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶¶ 21, 227	Yes	
			Primarily used in the hospital setting as an anti-inflammatory to treat pain after surgery	Watson	4th AMCC Appendix A	Yes	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Kineret	B	Brand	Used to reduce signs and symptoms and to slow progression of structural damage in adult patients with moderate to severe rheumatoid arthritis	Amgen	AMCC ¶ 217; 2nd AMCC ¶ 217; 3rd AMCC ¶ 233; 4th AMCC ¶ 230; 5th AMCC ¶ 230	No	Yes
Koate- HP	B	Multi-Source Biologic	Antihemophilic factor viii blood product	Bayer	MCCAC ¶ 74; AMCC ¶ 63; Modified 1st Am. Compl. ¶¶ 63, 286; 2nd AMCC ¶¶ 63, 286; 3rd AMCC ¶¶ 86, 302, Appendix; 4th AMCC ¶¶ 94, 299, Appendix A; Appendix to 4th AMCC	No	Yes
Kogenate	B	Multi-Source Biologic	Antihemophilic factor viii (recombinant)	Bayer	Compl. ¶ 74 (Sept. 6, 2002); 1st Am. Compl. ¶ 63 (July 28, 2003); Modified 1st Am. Compl. ¶¶ 63, 286; 2nd Am. Compl. ¶¶ 63, 286 (Feb. 24, 2005); 3rd Am. Compl. ¶¶ 86, 302, Appendix (Oct. 17, 2005); 4th Am. Compl. ¶¶ 94, 299, Appendix A (March 1, 2006); Appendix to 4th Am. Compl. (March 10, 2006)	No	Yes
Labetalol	B	Generic	Primarily used in the hospital setting to reduce the workload of the heart	Abbott	3rd AMCC ¶ 16; 4th AMCC ¶ 17	Yes	Yes
Lasix	B	Brand	A diuretic used to reduce swelling and fluid retention caused by a variety of diseases	Aventis	CAC ¶ 36; 2nd AMCC ¶¶ 567, 570; 3rd AMCC ¶¶ 567, 570	No	Yes
Leucovorin calcium	B	Generic	Primarily used in the hospital setting as an adjunct to chemotherapy	Abbott	CAC ¶ 36; 2nd AMCC ¶¶ 567, 570; 3rd AMCC ¶¶ 567, 570	No	Yes
			Chemotherapeutic agent (palliative treatment of patients with cancer)	Immunex	MCCAC ¶¶ 104, 291; AMCC ¶¶ 98, 422, Appendix A; 2 AMCC ¶¶ 98, 422; 3 AMCC ¶¶ 118, 433; 4 AMCC ¶¶ 119, 405; 5th AMCC ¶¶ 119, 406	No	Yes
				Sicor	AMCC ¶ 492; 2d AMCC ¶¶ 492, 502, 503; 3d AMCC ¶¶ 503, 513, 514, Appendix A; 4th AMCC ¶¶ 472, 482, 483, Appendix A; 5th AMCC ¶¶ 52, 473, 483, 484	No	Yes
Leukine	B	Brand (not sold by Immunex after 7/02)	A biologic and white blood cell stimulant (including use for post-bone marrow transplant, post-chemotherapy with acute myelogenous leukemia, and pre- and post-blood stem cell transplant)	Immunex	MCCAC ¶ 104; AMCC ¶¶ 98, 422; 2nd AMCC ¶¶ 98, 422; 3rd AMCC ¶¶ 118, 433; 4th AMCC ¶¶ 119, 405; 5th AMCC ¶¶ 119, 406	No	Yes
Levofloxacin	B	Generic	Primarily used in the hospital setting as an antibiotic	Abbott	3rd AMCC ¶¶ 19, 20; 4th AMCC ¶ 21	Yes	Yes
Lidocaine hydrochloride	B	Generic	Primarily used in the hospital setting as a local anesthetic	Abbott	3rd AMCC ¶¶ 15, 16, 20, 230; 4th AMCC ¶¶ 15, 17, 21, 227	Yes	Yes
Liposyn II / Fat emulsion	B	Multi-Source	Primarily used in the hospital setting in order to provide calories to those receiving parenteral nutrition	Abbott	AMCC ¶ 201; 2nd AMCC ¶ 201, Appendix B; 3rd AMCC ¶ 217, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶ 214	No	Yes
Lorazepam	B	Generic	Primarily used in the hospital setting to treat anxiety disorders	Abbott	AMCC ¶ 201; 2nd AMCC ¶ 201, Appendix A, Appendix B; 3rd AMCC ¶¶ 19, 39, 40, 217, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 21, 47, 48, 214	No	Yes
				Watson	AMCC ¶ 526; 2nd AMCC ¶¶ 526, Appendix A; 3rd AMCC ¶¶ 537, Appendix A and B; 4th AMCC ¶¶ 487, Appendix A	No	Yes
Lovenox	B	Brand	An anticoagulant therapy used to prevent deep vein thrombosis following hip replacement, knee replacement, or stomach surgery	Aventis	3rd AMCC ¶ 15; 4th AMCC ¶ 15; 5th AMCC ¶ 15	Yes	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Lyphocin	B	Branded Multi-Source	Injectable antibiotic used primarily in hospital setting	Fujisawa	AMCC ¶ 364, Appendix A; 2nd AMCC ¶371, Appendix A; 3rd AMCC ¶380, Appendix A; 4th AMCC ¶381, Appendix A; 5th AMCC ¶353	No	Yes
Magnese chloride	B	Generic	Primarily used in the hospital setting as an additive to IV solutions for total parenteral nutrition	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Magnesium sulfate	B	Generic	Primarily used in the hospital setting as an electrolyte replenisher	Abbott	3rd AMCC ¶ 15; 4th AMCC ¶ 15	Yes	Yes
				Sicor	4th AMCC ¶ 15; 5th AMCC ¶ 15	Yes	Yes
Mannitol	B	Generic	Primarily used in the hospital setting as a diuretic	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Marcaine	B	Generic	Primarily used in the hospital setting as a local anesthetic	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Medrol / Methylprednisolone	B	Multi-source	Anti-inflammatory	Pharmacia	2nd AMCC ¶ 115; 3rd AMCC ¶¶ 20, 132; 4th AMCC ¶ 133; 5th AMCC ¶ 133	No	Yes
Metaproterenol sulfate	B	Generic	Indicated as a bronchodilator for bronchial asthma and for reversible bronchospasm wich may occur in association with bronchitis	Dey	MCCAC ¶¶ 90, 251, AMCC ¶¶ 81, 83, 349, 359, 360, Appendix A; 2nd AMCC ¶¶ 81, 83, 349, 359, 360, Appendix A; 3rd AMCC ¶¶ 104, 106, 365, 375, 376, Appendix A; 4th AMCC ¶¶ 105, 107, 337, 347, 348, Appendix A; Revised 5th AMCC, ¶¶ 105, 107, 337, 347, 348	No	Yes
Methotrexate sodium	B	Multisource (not sold by Immunex after 6/01)	Anticancer agent	Immunex	MCCAC ¶ 291; AMCC ¶ 422, Appendix A; 2nd AMCC ¶ 422; 3rd AMCC ¶ 433; 4th AMCC ¶ 405; 5th AMCC ¶ 406	No	Yes
Metoclopramide	B	Generic	Primarily used in the hospital setting as an antiemetic	Abbott	3rd AMCC ¶ 230 ; 4th AMCC ¶ 227	No	Yes
Midazolam hydrochloride	B	Generic	Primarily used in the hospital setting as a sedative	Abbott	3rd AMCC ¶¶ 15, 16, 19; 4th AMCC ¶¶ 15, 17, 21	Yes	Yes
Mithracin	B	Multi-Source	Antineoplastic cancer medication	Bayer	Modified 1st Am. Compl. ¶ 286; 2nd AMCC ¶ 286; 3rd AMCC ¶ 302, Appendix; 4th AMCC ¶¶ 6, 299, Appendix A; Appendix to 4th AMCC	No	Yes
Monoclate / Monoclate-P	B	Multi-Source Biologic	Anti-hemophilic factor VIII:C, used to treat hemophilia	Aventis	MCCA ¶67; 1st AMCC ¶55; 2nd AMCC ¶55; 3rd AMCC ¶78; 4th AMCC ¶86; 5th AMCC ¶86	No	Yes
Mononine	B	Multi-Source Biologic	Coagulation factor IX, used to treat hemophilia B	Aventis	MCCA ¶67; 1st AMCC ¶55; 2nd AMCC ¶55; 3rd AMCC ¶78; 4th AMCC ¶86; 5th AMCC ¶86	No	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
Morphine sulfate	B	Generic	Primarily used in the hospital setting as a pain reliever	Abbott	3rd AMCC ¶¶ 15, 16; 4th AMCC ¶¶ 15, 17	Yes	Yes
Nadolol	B	Generic	Antihypertensive used in treatment of hypertension and angina	Watson	AMCC ¶¶ 526, 536; 2nd AMCC ¶¶ 526, 536, Appendixes A and B; 3rd AMCC ¶¶ 537, 547, Appendixes A and B; 4th AMCC ¶¶ 487, 495, 5th AMCC ¶ 488	No	Yes
Nalbuphine	B	Generic	Primarily used in the hospital setting as a pain reliever	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Nebupent	B	Branded Multi-Source	Oral anti-infective used in hospital setting to prevent and treat pneumo	Fujisawa	AMCC ¶ 364, Appendix A; 2nd AMCC ¶371, Appendix A; 3rd AMCC ¶380, Appendix A; 4th AMCC ¶381, Appendix A; 5th AMCC ¶353	No	Yes
Neosar / Cyclophosphamide	B	Generic	Oncologic	Pharmacia	CAC ¶ 41; 2nd AMCC ¶¶ 115, 458, 465, 466, 472, Ex. A, Ex. B; 3rd AMCC ¶¶ 132, 469, 476, 477, 483, Ex. A, Ex. B; 4th AMCC ¶¶ 133, 438, 445, 446, 452, App. A, App. B; 5th AMCC ¶¶ 133, 439, 446, 447, 453	No	Yes
Neostigmine methylsulfate	B	Generic	Primarily used in the hospital setting to correct muscle strength	Abbott	3rd AMCC ¶¶ 15, 230; 4th AMCC ¶¶ 15, 227	No	Yes
Novacaine / Procaine	B	Generic	Primarily used in the hospital setting as an anesthetic	Sicor	4th AMCC ¶ 15; 5th AMCC ¶ 15	Yes	Yes
				Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Novantrone	B	Brand (not sold by Immunex after 11/02)	Anticancer agent (including use for acute myelogenous leukemia, hormone refractory prostate cancer, and relapsing-remitting multiple sclerosis)	Immunex	CAC ¶ 38; MCCAC ¶¶ 104, 291; MCCAC ¶¶ 104, 291; AMCC ¶¶ 98, 422, Appendix A; 2nd AMCC ¶¶ 98, 422; 3rd AMCC ¶¶ 118, 433; 4th AMCC ¶¶ 119, 405; 5th AMCC ¶¶ 119, 406	No	Yes
Osmitol	B	Multi-source	Primarily used in the hospital setting as a diuretic	Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A; 3rd AMCC ¶ 288, App A; 4th AMCC ¶ 285; 4th AMCC Revised App A; 5th AMCC ¶ 285	No	Yes
Pancuronium bromide	B	Generic	Primarily used in the hospital setting as a muscle relaxer	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Pentam /Pentamidine isethionate	B	Branded Multi-Source	Anti-infective used primarily in hospital setting to treat AIDS related pneumonia	Fujisawa	CAC ¶31; MCCAC ¶93; AMCC ¶¶86, 364, 371, Appendix A; 2nd AMCC ¶¶86, 364, 371, Appendix A; 3rd AMCC ¶¶109, 380, 387, Appendix A; 4th AMCC ¶¶110, 381, 388, Appendix A; 5th AMCC ¶¶110, 353, 360-63	No	No
		Generic		Sicor	AMCC ¶ 492; 2d AMCC ¶¶ 492, 503; 3d AMCC ¶¶ 503, 514, Appendix A; 4th AMCC ¶¶ 472, 483, Appendix A; 5th AMCC ¶¶ 473, 484	No	Yes
Perphenazine	B	Generic	Psychotherapeutic agent used to manage psychotic disorders	Watson	AMCC ¶¶ 526, 536; 2nd AMCC ¶¶ 526, 536, Appendixes A and B; 3rd AMCC ¶¶ 537, 547, Appendixes A and B; 4th AMCC ¶¶ 487, 495, 5th AMCC ¶ 488	No	Yes
Phenylephrine	B	Generic	Adrenergic receptor used primarily as a decongestant	Sicor	4th AMCC ¶ 15; 5th AMCC ¶ 15	Yes	Yes
Potassium acetate / Potassium chloride	B	Generic	Primarily used in the hospital setting to treat low blood levels	Abbott	3rd AMCC ¶¶ 15, 16, 230; 4th AMCC ¶¶ 15, 17, 227	Yes	Yes
Prograf	B	Brand	Self-administered immunosuppressant used for transplants, Medicare Part B special	Fujisawa	CAC ¶ 31; AMCC ¶364, Appendix A; 2nd AMCC ¶371, Appendix A; 3rd AMCC ¶380, Appendix A; 4th AMCC ¶381, Appendix A; 5th AMCC ¶¶ 353, 360-63	No	Yes
Promethazine	B	Generic	Primarily used in the hospital setting as an antihistamine	Abbott	3rd AMCC ¶¶ 15, 19, 20; 4th AMCC ¶¶ 15, 21	Yes	Yes
				Sicor	4th AMCC ¶¶ 15, 21; 5th AMCC ¶¶ 15, 21	Yes	Yes
				Watson	4th AMCC ¶ 15	Yes	No
Propranolol HCL	B	Generic	Beta blocker for treatment of hypertension and other cardiovascular conditions	Watson	AMCC ¶ 526; 2nd AMCC ¶ 526, Appendixes A and B; 3rd AMCC ¶ 537, Appendixes A and B; 4th AMCC ¶ 487, 5th AMCC ¶ 488	No	Yes
Propofol	B	Generic	Primarily used in the hospital setting as an anesthetic	Abbott	3rd AMCC ¶ 15; 4th AMCC ¶ 15	Yes	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
				Sicor	4th AMCC ¶ 15; 5th AMCC ¶ 15	Yes	Yes
Ranitidine HCL	B	Generic	Antihistamine	Watson	AMCC ¶ 526; 2nd AMCC ¶ 526, Appendixes A and B; 3rd AMCC ¶ 537, Appendixes A and B; 4th AMCC ¶ 487	No	Yes
Recombinate	B	Multi-Source Biologic	Anti-hemophilic factor (recombinant), used to treat hemophilia	Baxter	MCCAC ¶ 71; AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A; 3rd AMCC ¶¶ 83, 288, App A; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A; 5th AMCC ¶¶ 91, 285	No	Yes
Sodium acetate	B	Generic	Primarily used in the hospital setting as a corticosteroid	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Sodium chloride	B	Generic	Primarily used in the hospital setting as a diluent, as a way to give injectable medicines to flush intravenous lines and for other conditions	Abbott	MCCAC ¶¶ 26, 54, 190; AMCC ¶¶ 29, 40, 187, 201; 2nd AMCC ¶¶ 29, 40, 187, 201, 208, Appendix A, Appendix B; 3rd AMCC ¶¶ 15, 16, 20, 21, 39, 63, 203, 217, 224, Amended List of Purchases Made By Plaintiffs; 4th AMCC ¶¶ 15, 17, 25, 47, 71, 200, 214, 221	No	Yes
				Baxter	MCCAC ¶ 217, AMCC ¶¶ 60, 272; 2nd AMCC ¶¶ 60, 272, App A, App B; 3rd AMCC ¶¶ 83, 288, App A, App B; 4th AMCC ¶¶ 91, 285; 4th AMCC Revised App A, App B; 5th AMCC ¶¶ 91, 285	No	Yes
				Dey	AMCC ¶ 360; 2nd AMCC ¶ 360; 3rd AMCC ¶ 376; 4th AMCC ¶ 348; Revised 5th AMCC ¶ 348	No	Yes
				Sicor	4th AMCC ¶¶ 15, 17, 50; 5th AMCC ¶¶ 15, 17	Yes	Yes
Solu-cortef / Hydrocortisone sodium succinate	B	Multi-source	Hormone	Pharmacia	2nd AMCC ¶¶ 115, 458, 466, Ex. A, Ex. B; 3rd AMCC ¶¶ 19, 132, 469, 477, Ex. A, Ex. B; 4th AMCC ¶¶ 133, 438, 446, App. A, App. B; 5th AMCC ¶¶ 133, 439, 447	No	Yes
Solu-medrol	B	Multi-source	Anti-inflammatory	Pharmacia	2nd AMCC ¶¶ 458, 466, Ex. A, Ex. B; 3rd AMCC ¶¶ 21, 469, 477, Ex. A, Ex. B; 4th AMCC ¶¶ 133, 438, 446, App. A, App. B; 5th AMCC ¶¶ 133, 439, 447	No	Yes
Succinylcholine chloride	B	Generic	Primarily used in the hospital setting as a muscle relaxer	Abbott	3rd AMCC ¶ 15; 4th AMCC ¶ 15	Yes	Yes
Taxotere	B	Brand	A taxane used to treat a variety of cancers	Aventis	MCCA ¶67; 1st AMCC ¶250, and Appendix A; 2nd AMCC ¶250; 3rd AMCC ¶266; 4th AMCC ¶263; 5th AMCC ¶263	No	Yes
Thioplex / Thiotepa	B	Brand (until 2001); multisource (2001-forward)	Chemotherapeutic agent (palliative treatment of patients with cancer)	Immunex	MCCAC ¶ 104; AMCC ¶¶ 98, 422; 2nd AMCC ¶¶ 98, 422; 3rd AMCC ¶¶ 118, 433; 4th AMCC ¶¶ 119, 405; 5th AMCC ¶¶ 119, 406	No	Yes
Tobramycin sulfate / Tobramycin/sodium chloride	B	Generic	Primarily used in the hospital setting as an antibiotic for the treatment of lung infections	Sicor	MCCAC ¶ 323; AMCC ¶¶ 124, 492, 501; 2d AMCC ¶¶ 124, 492, 501, 502; 3d AMCC ¶¶ 141, 503, 512, Appendix A; 4th AMCC ¶¶ 142, 472, 481, Appendix A; 5th AMCC ¶¶ 142, 473, 482	No	Yes

DRUG NAME	GROUP	TYPE	DESCRIPTION	NAMED DEFENDANT	COMPLAINT CITES	SUBJECT TO MOTION TO STRIKE	SUBJECT TO DISCOVERY
				Abbott	MCCAC ¶¶ 54, 190; AMCC ¶¶ 40, 201, 208; 2 nd AMCC ¶¶ 40, 201, 208, Appendix A, Amended List of Purchases Made by Plaintiff; 3 rd AMCC ¶ 217, 224, Amended List of Purchases Made by Plaintiffs; 4 th AMCC ¶ 71, 214, 221	No	Yes
Toposar [See Etoposide]	B	Generic	Primarily used in the hospital setting as a treatment for testicular cancer	Abbott	3rd AMCC ¶ 231; 4th AMCC ¶ 228	No	Yes
				Pharmacia	CAC ¶ 41; 2nd AMCC ¶¶ 115, 187, 458, 465, 466, 469, 472, Ex. A, Ex. B; 3rd AMCC ¶¶ 52, 132, 203, 469, 476, 477, 480, 483, Ex. A, Ex. B; 4th AMCC ¶¶ 17, 60, 133, 438, 444, 445, 446, 449, 452, App. A, App. B; 5th AMCC ¶¶ 17, 60, 133, 200, 439, 446, 447, 450, 453	No	Yes
				Sicor	MCCAC ¶ 319; AMCC ¶¶ 492, 496; 2d AMCC ¶¶ 492, 494, 496, 502, 503; 3d AMCC ¶¶ 503, 505, 507, 513, 514, Appendix A; 4th AMCC ¶¶ 17, 60, 472, 474, 476, 482, 483, Appendix A; 5th AMCC ¶¶ 17, 60, 473, 475, 477, 483, 484	No	Yes
Travasol / Travasol with dextrose	B	Multi-source	Primarily used in the hospital setting as an additive to IV solutions for amino acid delivery	Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A; 3rd AMCC ¶ 288, App A; 4th AMCC ¶ 285; 4th AMCC Revised App A; 5th AMCC ¶ 285	No	Yes
Trelstar / Triptorelin pamoate	B	Brand	Oncologic	Pharmacia	3rd AMCC ¶ 53; 4th AMCC ¶ 61, App. A; 5th AMCC ¶ 61	Yes	Yes
				Watson	4th AMCC Appendix A	Yes	Yes
Vancocin / Vancocin HCL / Vancomycin/ Vancomycin HCL	B	Generic	Primarily used in the hospital setting as an antibiotic	Abbott	MCCAC ¶¶ 54, 185, 186, 187, 188, 190; AMCC @ TOC, ¶¶ 40, 201, 208, 209, 210, 211; 2nd AMCC @ TOC, ¶¶ 40, 201, 208, 209, 210, 211, Appendix A, Appendix B; 3rd AMCC ¶¶ 52, 63, 224, 225, 226, 227, Amended List of Purchases Made By Plaintiffs; 4th AMCC @ TOC, ¶¶ 21, 60, 71, 214, 221, 222, 223, 224	No	Yes
				Baxter	AMCC ¶ 272; 2nd AMCC ¶ 272, App A, App B; 3rd AMCC ¶ 288, App A, App B; 4th AMCC ¶ 285; 4th AMCC Revised App A, App B; 5th AMCC ¶ 285	No	Yes
				Fujisawa	MCCAC ¶¶ 93; AMCC ¶¶ 86, 364, 371, Appendix A; 2nd AMCC ¶¶ 86, 364, 371, Appendix A; 3rd AMCC ¶¶ 109, 380, 387, Appendix A; 4th AMCC ¶¶ 110, 381, 388, Appendix A; 5th AMCC ¶¶ 110, 353, 360-63	No	Yes
				Watson	MCCAC ¶¶ 130, 327; AMCC ¶¶ 130, 187, 526, 534; 2nd AMCC ¶¶ 130, 187, 526, 534, Appendixes A and B; 3rd AMCC ¶¶ 147, 537, 545, Appendixes A and B; 4 AMCC ¶¶ 60, 140, 200, 487, 495, Appendix A	No	Yes
Verapamil HCL	B	Generic	Cardiovascular agent used in treatment for angina and arrhythmia	Watson	AMCC ¶ 526; 2nd AMCC ¶ 526, Appendixes A and B; 3rd AMCC ¶ 537, Appendixes A and B; 4th AMCC ¶¶ 487, 491, 5th AMCC ¶ 488	No	Yes
Vinblastine sulfate	B	Generic	Chemotherapy drug used in clinical setting to treat certain cancers	Fujisawa	AMCC ¶ 364, Appendix A; 2nd AMCC ¶ 371, Appendix A; 3rd AMCC ¶ 380, Appendix A; 4th AMCC ¶ 381, Appendix A; 5th AMCC ¶¶ 110, 353, 360-63	No	Yes
Vincasar / Vincristine / Vincristine sulfate	B	Generic	Primarily used in the hospital setting as an oncologic	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
		Multi-source		Pharmacia	1st Amd Compl ¶¶ 180, 182; 2nd AMCC ¶¶ 115, 458, 465, 466, 470, 471, Ex. A, Ex. B; 3rd AMCC ¶¶ 132, 469, 476, 477, 481, 482, Ex. A, Ex. B; 4th AMCC ¶¶ 21, 133, 438, 445, 446, 450, 451, 452, App. A, App. B; 5th AMCC ¶¶ 133, 439, 447, 451, 452, 453	No	Yes
		Generic		Sicor	4th AMCC ¶ 21; 5th AMCC ¶ 21	Yes	Yes
Water for injection bacteriostatic	B	Generic	Primarily used in the hospital setting as a diluent	Abbott	3rd AMCC ¶ 230; 4th AMCC ¶ 227	No	Yes
Zemplar	B	Branded	Primarily used in the hospital setting as a man-made form of vitamin D	Abbott	MCCAC ¶ 54; AMCC ¶ 40; 2nd AMCC ¶ 40; 3rd AMCC ¶ 63; 4th AMCC ¶ 71	No	Yes
Zinc chloride	B	Generic	Primarily used in the hospital setting as an antiseptic	Abbott	3rd AMCC ¶ 227; 4th AMCC ¶ 227	No	Yes

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESale PRICE
LITIGATION

MDL NO. 1456

THIS DOCUMENT RELATES TO:

TRACK TWO SETTLEMENT

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

DECLARATION OF TINA M. TABACCHI

I, Tina M. Tabacchi, declare and state as follows:

1. I am a partner at the law firm of Jones Day and have served as co-lead counsel for Track 2 Defendant Abbott Laboratories ("Abbott") in this litigation. In that capacity, I have been involved in overseeing discovery conducted of Abbott in this matter.
2. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 Settlement. The chart is true and accurate with respect to the drugs identified as having been named for Abbott ("Abbott Subject Drugs"). In particular, each of the Abbott Subject Drugs has been subject to discovery in this litigation.
3. During the course of the MDL AWP litigation, Abbott produced over one million pages of paper and electronic documents, and 36 CDs of sales and rebate data to MDL plaintiffs' counsel. The Abbott Subject Drugs are included in either the data productions, the document productions, or both.
4. In addition to responding to the various written discovery requests served by MDL plaintiffs' counsel, Abbott produced at least 38 witnesses for deposition (testifying in

either their individual capacities or as corporate representatives under Rule 30(b)(6)). In addition, Abbott produced to the MDL plaintiffs in discovery the deposition transcripts of at least 10 additional depositions of Abbott witnesses taken by other AWP plaintiffs. The majority of depositions include specific testimony/reference deposition exhibits concerning hospital products marketed or sold by Abbott's former Hospital Products Division, many of which are included on the list of Abbott Subject Drugs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2nd day of August, 2011 in Chicago, Illinois.

/s/ Tina M. Tabacchi
Tina M. Tabacchi

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESALE PRICE)
LITIGATION)
_____)

MDL No. 1456
Civil Action: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:)
)
TRACK TWO SETTLEMENT)
_____)

Hon. Patti B. Saris

DECLARATION OF JOSEPH H. YOUNG

I, Joseph H. Young, hereby declare and state as follows:

1. I am a partner in the Baltimore, Maryland office of Hogan Lovells US LLP (formerly Hogan & Hartson LLP) and have served as co-lead counsel for defendant Amgen Inc. ("Amgen") since the outset of this litigation in 2001. In that capacity, I have been personally involved in overseeing discovery over the course of these proceedings.
2. I am familiar generally with plaintiffs' discovery requests and Amgen's productions of documents and data in response to those requests.
3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of Amgen's six subject drugs in this case (Aranesp®, Epogen®, Enbrel®, Kineret®, Neupogen® and Neulasta®) (the "Amgen subject drugs").

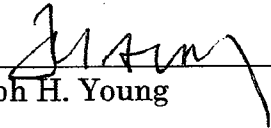
4. More particularly, all of Amgen's subject drugs have been subject to discovery throughout these proceedings. By way of example, each of these products was specifically included in plaintiffs' definition of "AWPIDs" (or subject drugs) in:

- Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in Appendix A to the Amended Master Consolidated Complaint, filed in June 2003);
- Plaintiffs' Request for Production of Documents to Aventis, Abbott, Amgen, Boehringer, BMS, Johnson & Johnson, GSK, Hoffman, Immunex and Schering-Plough and Interrogatories to All Defendants Subject to Discovery (12/03/03) (same);
- Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicor, TAP and Watson and to All Other Defendants with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);
- Plaintiffs' Request for Production to Defendants Regarding HHS ASPs (5/26/04) (same);
- Plaintiffs' Amended and/or Supplemental Request for Production of Documents to Phase 2 [sic] Defendants Relating to IMS Data (11/15/05) (identifying drugs).

5. In response to plaintiffs' requests, Amgen has produced more than 1.7 million pages of documents and transactional data relating to all six of Amgen's subject drugs, including Enbrel® (which was marketed and sold prior to 2002 by Immunex Corp., which separately produced transactional data and documents relating to Enbrel®). In addition, each of these six products was included within the scope of at least one Rule 30(b)(6) deposition taken during the course of these proceedings.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2nd, 2011.



Joseph H. Young

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESAL PRICE LITIGATION

MDL No. 1456

THIS DOCUMENT RELATES TO:

CIVIL ACTION: 01-CV-12257-PBS

TRACK TWO SETTLEMENT

Judge Patti B. Saris

DECLARATION OF MICHAEL L. KOON

1. I am a partner in the law firm of Shook, Hardy & Bacon, L.L.P and have represented Defendant Aventis Pharmaceuticals Inc. since the litigation's outset in 2001 and currently represent both Aventis Pharmaceuticals Inc. and Aventis-Behring LLC (collectively "Aventis"). In that capacity, I have been personally involved in overseeing discovery over the course of these proceedings.

2. I am familiar generally with plaintiffs' discovery requests and Aventis' production of documents and data in response to those requests.

3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each Aventis drug identified.

4. Each Aventis drug identified in Exhibit A is a subject drug in this litigation and, as such, has been subject to some form of discovery, either by being expressly named in one of Plaintiffs' numerous complaints or by being expressly identified as an AWPID in Plaintiffs discovery requests, including:

- Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in the Amended Master Consolidated Complaint, filed in June 2003);

- Plaintiffs' Request for Production of Documents to Aventis, Abbott, Amgen, Boehringer, BMS, Johnson & Johnson, GSK, Hoffman, Immunex and Schering-Plough and Interrogatories to All Defendants Subject to Discovery (12/03/03) (same);
- Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicor, TAP and Watson and to All Other Defendants with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);
- Plaintiffs' Request for Production to Defendants Regarding HHS ASPs (5/26/04) (same);
- Plaintiffs' Amended and/or Supplemental Request for Production of Documents to Phase 2 [sic] Defendants Relating to IMS Data (11/15/05) (identifying drugs).

5. Plaintiffs' conducted broad-brush, cross-cutting discovery in this litigation which included all of Aventis' subject drugs, including each drug identified in Exhibit A, regardless of whether Plaintiffs expressly identified the drug as an AWPID in their discovery requests.

6. In response to Plaintiffs' discovery requests, Aventis produced numerous disks of transactional data and more than a quarter million pages of responsive documents. The responsive documents included brand plans, business plans, and sales and promotional material for Aventis subject drugs. In addition to the voluminous document and data productions, Aventis provided thousands of pages of deposition testimony to Plaintiffs, who took numerous depositions of Aventis personnel, including six depositions of Aventis 30(b)(6) designees.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: August 3, 2011

/s/ Michael L. Koon
Michael L. Koon

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION,

)
)
) MDL No. 1456
) Civil Action No. 01-12257-PBS
)
)

THIS DOCUMENT RELATES TO:

TRACK 2 SETTLEMENT

)
)
) Judge Patti B. Saris
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DECLARATION OF MERLE M. DELANCEY

I, Merle M. DeLancey, hereby declare and state as follows:

1. I am a partner in the Washington, DC office of Dickstein Shapiro LLP, and have been one of the counsel of record for defendants Baxter Healthcare Corporation and Baxter International Inc. (collectively "Baxter") since the outset of this litigation in 2002. In that capacity, I have been personally involved in overseeing discovery over the course of these proceedings.

2. I am familiar generally with plaintiffs' discovery requests and Baxter's productions of documents and data in response to those requests.

3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of Baxter's drugs identified.

4. More particularly, all of Baxter's subject drugs have been subject to discovery throughout these proceedings. By way of example, each of these products was specifically included in plaintiffs' definition of "AWPIDs" (or subject drugs) in:

- Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in Appendix A to the Amended Master Consolidated Complaint, filed in June 2003);
- Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicor, TAP, and Watson and to All Other Defendants with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);
- Plaintiffs' Request for Production to Defendants Regarding HHS ASPs (5/26/04) (same);
- Plaintiffs' Amended and/or Supplemental Request for Production of Documents to Phase 2 [sic] Defendants Relating to IMS Data (11/15/05) (identifying drugs).

5. In response to plaintiffs' requests, Baxter made rolling productions totaling over one million documents. Baxter produced, among other information and data, sales transaction data, archived files, contract files, sales and marketing documents, correspondence with pricing compendia, field sales notes, emails, IMS data, policy manuals, and organization charts.

6. Early in discovery, Baxter and plaintiffs agreed to focus discovery on drugs related to Baxter's Medication Delivery and BioScience divisions—Bebulin, Buminate, Claforan, Dextrose, Gammagard, Gentam, Gentran, Heparin, Iveegam, Osmitrol, Recombinate, Sodium Chloride, and Travasol. Baxter produced sales transaction data for a fifteen-year period (1991 – March 2005) for these drugs.

7. The remaining Baxter subject drugs—Ativan, Brevibloc, Cisplatin, Doxorubicin, and Vancocin—related to Baxter's Anesthesia and Critical Care division, which are

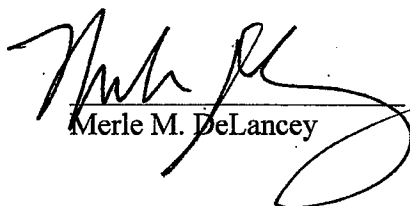
predominantly administered in a hospital in the inpatient setting (*i.e.* Medicare Part A). Plaintiffs agreed that Baxter could produce a sampling of information believed to be responsive to the request. Baxter ultimately produced over 45,000 documents related to its Anesthesia and Critical Care division drugs.

8. Plaintiffs also agreed to a sampling of documents related to Aggrastat because the Aggrastat NDCs listed in Appendix A to the Amended Master Consolidated Complaint (and each list of Baxter Aggrastat NDCs in subsequent amended complaints), were manufactured by Baxter for sale by another company. Baxter neither sold directly nor was involved in the pricing decisions concerning those Aggrastat NDCs.

9. During the course of discovery, Baxter made available individual and 30(b)6 witnesses for all Baxter drugs at issue in the Track Two Settlement. Plaintiffs deposed eighteen Baxter witnesses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2011


Merle M. DeLancey

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESALE PRICE)
LITIGATION)
_____)

MDL No. 1456
Civil Action: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:)
)
TRACK TWO SETTLEMENT)
_____)

Hon. Patti B. Saris

DECLARATION OF RICHARD D. RASKIN

I, Richard D. Raskin, hereby declare and state as follows:

1. I am a partner in the Chicago, Illinois office of Sidley Austin LLP and have served as co-lead counsel for defendant Bayer Corporation ("Bayer") since the outset of this litigation in 2001. In that capacity, I have been personally involved in overseeing discovery during the course of these proceedings.

2. I am familiar generally with plaintiffs' discovery requests and Bayer's productions of documents and data in response to those requests.

3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of Bayer's six subject drugs in this case (Cipro®, DTIC-Dome®, Gamimune N®, Koate-HP®, Kogenate® and Mithracin®) (the "Bayer subject drugs").

4. More particularly, all of Bayer's subject drugs have been subject to discovery throughout these proceedings. By way of example, each of these

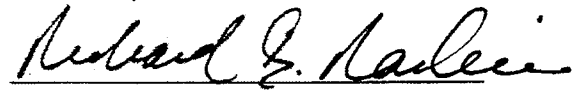
products was specifically included in plaintiffs' definition of "AWPIDs" (or subject drugs) in:

- Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in Appendix A to the Amended Master Consolidated Complaint, filed in June 2003);
- Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicom, TAP and Watson and to All Other Defendants with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);
- Plaintiffs' Request for Production to Defendants Regarding HHS ASPs (5/26/04) (same);
- Plaintiffs' Amended and/or Supplemental Request for Production of Documents to Phase 2 [sic] Defendants Relating to IMS Data (11/15/05) (identifying drugs).

5. In response to plaintiffs' requests, Bayer has produced roughly 1.5 million pages of documents and transactional data relating to all six of Bayer's subject drugs, including roughly 825,000 pages of hard copy documents that Bayer made available to plaintiffs' counsel for review. In addition, each of these six products was included within the scope of at least one Rule 30(b)(6) deposition taken during the course of these proceedings.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2011.


Richard D. Raskin

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESAL PRICE LITIGATION

MDL No. 1456
Civil Action: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:
TRACK TWO SETTLEMENT

Hon. Patti B. Saris

DECLARATION OF CHRISTOPHER C. PALERMO

I, Christopher C. Palermo, hereby declare and state as follows:

1. I am a partner in the New York City office of Kelley Drye & Warren LLP and have served as one of the counsel for defendant Dey, Inc. (“Dey”). In that capacity, I have been personally involved in overseeing discovery over the course of these proceedings.

2. I am familiar generally with plaintiffs’ discovery requests and this Court’s Case Management Orders (“CMOs”), and Dey’s productions of documents and data in response to plaintiffs’ requests and this Court’s CMOs.

3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of Dey's drugs identified in Exhibit B to the Track 2 Settlement (AccuNeb®, albuterol sulfate, acetylcysteine, cromolyn sodium, ipratropium bromide, metaproterenol sulfate and sodium chloride) (the "Dey subject drugs").

4. More particularly, each of the Dey subject drugs has been subject to discovery in this litigation. Each of the Dey subject drugs except AccuNeb and sodium chloride

was specifically included in plaintiffs' definition of "AWPIDs" (or subject drugs) in various discovery requests, including, among others:

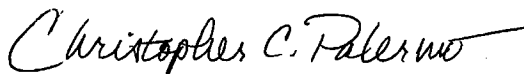
- Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in Appendix A to the Amended Master Consolidated Complaint, filed in June 2003);
- Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicor, TAP and Watson and to All Other Defendants with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);

5. In addition, certain of this Court's CMOs required production of documents produced in connection with federal and state investigations and other legal proceedings. Dey's production pursuant to certain of this Court's CMOs included productions relating to each of the Dey subject drugs.

6. In response to plaintiffs' requests and this Court's CMOs, Dey has produced approximately 2.4 million pages of documents and 11 CDs of sales transactional data, containing tens of millions of lines of data, relating to the Dey subject drugs. Dey's production for each of the Dey subject drugs includes either data productions, document productions, or both. In addition, the Amended Notice of Rule 30(B)(6) deposition for Dey encompassed each of the Dey subject drugs, and each of the Dey subject drugs other than sodium chloride was the subject of questioning or testimony at Dey's Rule 30(b)(6) deposition taken during the course of these proceedings.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2011.


Christopher C. Palermo

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL No. 1456
LITIGATION)	Civil Action: 01-CV-12257-PBS
THIS DOCUMENT RELATES TO:)	
TRACK TWO SETTLEMENT)	Hon. Patti B. Saris

DECLARATION OF ANDREW L. HURST

I, Andrew L. Hurst, hereby declare and state as follows:

1. I am a partner in the Washington, DC office of Reed Smith LLP, and have been one of the counsel of record for defendants Fujisawa USA, Inc. and Fujisawa Healthcare, Inc. (collectively "Fujisawa") since the outset of this litigation in 2001. In that capacity, I have been personally involved in overseeing discovery over the course of these proceedings.
2. I am familiar generally with plaintiffs' discovery requests and Fujisawa's productions of documents and data in response to those requests.
3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of Fujisawa's drugs in this case.
4. More particularly, all of the Fujisawa drugs in this case have been subject to discovery in some form or fashion throughout these proceedings.

Nearly all of the products were included in plaintiffs' definition of "AWPIDs" (or subject drugs) in:


- Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in the Amended Master Consolidated Complaint, filed in June 2003);
- Plaintiffs' Request for Production of Documents to Aventis, Abbott, Amgen, Boehringer, BMS, Johnson & Johnson, GSK, Hoffman, Immunex and Schering-Plough and Interrogatories to All Defendants Subject to Discovery (12/03/03) (same);
- Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicor, TAP and Watson and to All Other Defendants with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);
- Plaintiffs' Request for Production to Defendants Regarding HHS ASPs (5/26/04) (same);
- Plaintiffs' Amended and/or Supplemental Request for Production of Documents to Phase 2 [sic] Defendants Relating to IMS Data (11/15/05) (identifying drugs).

5. Plaintiffs' discovery requests were such that documents and materials concerning the few Fujisawa drugs that were not identified as AWPIDs were produced as responsive to those requests.

6. In response to plaintiffs' requests, Fujisawa has produced more than 100,000 pages of documents and transactional data relating to the Fujisawa drugs in this case. In addition, many of Fujisawa's drugs were discussed in the depositions of witnesses for other defendants because the drugs were generic, or branded generics, and sold by other defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2011.



Andrew L. Hurst

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESAL PRICE
LITIGATION

THIS DOCUMENT RELATES TO ALL
ACTIONS

MDL NO. 1456

CIVIL ACTION NO. 01-CV-12257-PBS

Judge Patti B. Saris

DECLARATION OF KATHLEEN M. O'SULLIVAN

I, Kathleen M. O'Sullivan, duly declare as follows:

1. I am a partner at the law firm of Perkins Coie LLP, in Seattle, Washington. I have served as co-lead counsel for Immunex in this case since 2002. In that capacity, I have been personally involved in overseeing discovery over the course of these proceedings.

2. I am familiar generally with plaintiffs' discovery requests and Immunex's productions of documents and data in response to those requests.

3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of Immunex's five subject drugs in this case (leucovorin

calcium, Leukine, methotrexate sodium, Novantrone, and Thioplex/thiotepa (the “Immunex subject drugs”).

4. All five of the Immunex subject drugs in the Track 2 settlement were subject to discovery. For example, these drugs were listed on Appendix A to the Amended Master Consolidated Class Action Complaint and thus, under the plaintiffs’ definition of “AWPIDs” were the subject of discovery in Plaintiffs’ First Request for Production of Documents served June 17, 2003 and Plaintiffs’ Omnibus Requests for Production and Interrogatories served March 31, 2004.

5. Immunex responded to these and subsequent discovery requests by producing voluminous documents and transactional data for the five subject drugs. Immunex’s initial production of documents pursuant to Case Management Order 5 consisted of over 100 boxes of documents that Immunex had previously produced to government authorities in response to AWP-related requests, and Immunex subsequently made several supplemental productions of documents and transactional data.

6. In further discovery of Immunex, plaintiffs took 11 individual depositions of Immunex witnesses and a Rule 30(b)(6) deposition at which the Immunex representative was questioned about all five of the Immunex drugs in the Track 2 settlement.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct based on my own personal knowledge.

Executed this 3rd day of August, 2011.

/s/ Kathleen M. O'Sullivan
Kathleen M. O'Sullivan

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESAL PRICE LITIGATION

MDL No. 1456
Civil Action: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:
TRACK TWO SETTLEMENT

Hon. Patti B. Saris

DECLARATION OF J. CLAYTON EVERETT, JR.

I, J. Clayton Everett, Jr., hereby declare and state as follows:

1. I am a partner in the Washington, DC office of Morgan, Lewis & Bockius LLP, and have been counsel of record for defendants Pharmacia Corporation and Pharmacia & Upjohn, Inc. (collectively “Pharmacia”) since 2002. I have been involved in overseeing discovery over the course of these proceedings.

2. I am familiar generally with plaintiffs' discovery requests and Pharmacia's responses to those requests.

3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint submission in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of the Pharmacia products identified.

4. More particularly, all of the drugs identified as Pharmacia products in Exhibit B to the Track 2 Settlement Agreement (“Pharmacia Exhibit B Drugs”) have been subject to discovery in these proceedings. Most of the Pharmacia Exhibit B Drugs were included in plaintiffs’ definition of “AWPIDs” in:

- Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in Appendix A to the Amended Master Consolidated Complaint, filed in June 2003);
- Plaintiffs' Request for Production of Documents to Aventis, Abbott, Amgen, Boehringer, BMS, Johnson & Johnson, GSK, Hoffman, Immunex and Schering-Plough and Interrogatories to All Defendants Subject to Discovery (12/03/03) (same);
- Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicor, TAP and Watson and to All Other Defendants with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);
- Plaintiffs' Request for Production to Defendants Regarding HHS ASPs (5/26/04) (same);
- Plaintiffs' Amended and/or Supplemental Request for Production of Documents to Phase 2 [sic] Defendants Relating to IMS Data (11/15/05) (identifying drugs).

5. Pharmacia produced documents and/or sales data in the MDL 1456 litigation relating to all of the Pharmacia Exhibit B Drugs, including drugs that were not AWPIDs.

6. In addition, eleven Pharmacia witnesses testified in their individual or corporate capacity about Pharmacia's marketing and sales activities for both AWPIDs and for other Pharmacia Exhibit B Drugs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2011.


J. Clayton Everett, Jr.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESALE PRICE)
LITIGATION)
_____)

MDL No. 1456
Civil Action: 01-CV-12257-PBS

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)
TRACK TWO SETTLEMENT)
_____)

Hon. Patti B. Saris

DECLARATION OF MICHAEL C. OCCHUIZZO

I, Michael C. Occhuizzo, hereby declare and state as follows:

1. I am a partner in the Washington, D.C. office of Kirkland & Ellis LLP and have served as counsel to Sicom, Inc., Gensia Sicom Pharmaceuticals, Inc., and Gensia, Inc. in this litigation since 2007.

2. I am generally familiar with plaintiffs' discovery requests and Sicom's production of documents and data in response to those requests.

3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint memorandum in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of Sicom's subject drugs in this case (the "Sicom Subject Drugs").

4. More particularly, all of the Sicom Subject Drugs have been subject to discovery in some form or fashion throughout these proceedings. Many of these products were included in plaintiffs' definition of "AWPIDs" in:

- Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in the Amended Master Consolidated Complaint, filed in June 2003);

- Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicom, TAP and Watson and to All Other Defendants with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);
- Plaintiffs' Request for Production to Defendants Regarding HHS ASPs (5/26/04) (same);
- Plaintiffs' Amended and/or Supplemental Request for Production of Documents to Phase 2 [sic] Defendants Relating to IMS Data (11/15/05) (identifying drugs).

5. In addition, as part of its response to plaintiffs' requests, Sicom has produced more than 70,000 pages of documents and transactional data relating to the sales and marketing of the Sicom Subject Drugs, as well as documents concerning Sicom's general marketing practices, customer communications, and transactional data applicable to all products. In addition, two Sicom witnesses have testified about Sicom's marketing and sales activities for both AWPIDs and for other products comprising the Sicom Subject Drugs.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on August 2, 2011.



Michael C. Occhuzzo
KIRKLAND & ELLIS LLP

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESALE PRICE)
LITIGATION)
_____)

MDL No. 1456
Civil Action: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:)
)
TRACK TWO SETTLEMENT)
_____)

Hon. Patti B. Saris

DECLARATION OF JOHN F. NAGLE

I, John F. Nagle, hereby declare and state as follows:

1. I am one of the attorneys for Defendant Watson Pharmaceuticals, Inc. ("Watson"). and have personal knowledge of the matters set forth herein.
2. I am familiar generally with plaintiffs' discovery requests and Watson's productions of documents and data in response to those requests.
3. I have reviewed the chart attached as Exhibit A to the Track 2 Defendants' joint memorandum in support of the proposed Track 2 settlement. The chart is true and accurate with respect to each of Watson's subject drugs in this case (the "Watson Subject Drugs").
4. More particularly, all of the Watson Subject Drugs have been subject to discovery in some form or fashion throughout these proceedings. Many of these products were included in plaintiffs' definition of "AWPIDs" in:
 - Plaintiffs' First Request for Production of Documents to All Defendants (6/17/03) (defining AWPIDs by reference to drugs listed in the Amended Master Consolidated Complaint, filed in June 2003);
 - Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants Abbott, Amgen, Aventis, Baxter, Bayer, Boehringer, Braun, Dey, Fujisawa, Novartis, Pfizer, Pharmacia, Sicor, TAP and Watson and to All Other Defendants

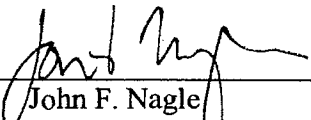
with Respect to Drugs That Were Not Previously Subject to Discovery (3/31/04) (same);

- Plaintiffs' Request for Production to Defendants Regarding HHS ASPs (5/26/04) (same);
- Plaintiffs' Amended and/or Supplemental Request for Production of Documents to Phase 2 [sic] Defendants Relating to IMS Data (11/15/05) (identifying drugs).

5. In addition, as part of its response to plaintiffs' requests, Watson has produced more than 58,000 pages of documents and transactional data relating to the sales and marketing of the Watson Subject Drugs, as well as documents concerning Watson's general marketing practices, customer communications, and transactional data applicable to all products. In addition, five Watson 30(b)(6) witnesses have testified about Watson's marketing and sales activities for both AWPIDs and for other products comprising the Watson Subject Drugs.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on August 2, 2011.



John F. Nagle
K&L Gates LLP